



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

April 15, 2011

Mr. Michael Berkoff
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SRF-6J)
Chicago, Illinois 60604-3507



Dear Mr. Berkoff:

SUBJECT: Comments on the Remedial Action Work Plan, Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site, Operable Unit 2: Willow Boulevard/A-Site Landfill

The Michigan Department of Environmental Quality (MDEQ) has received (March 31, 2011) and reviewed the Remedial Action (RA) Work Plan for the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site, Operable Unit 2: Willow Boulevard/A-Site Landfill prepared by ARCADIS on behalf of Georgia-Pacific LLC. The MDEQ appreciates the opportunity to assist the United States Environmental Protection Agency (USEPA) by providing comments on the RA Work Plan for the Willow Boulevard/A-Site Landfill.

This comment letter also includes comments from Ms. Judith Alfano, Compliance and Enforcement Section, Remediation Division, MDEQ, on behalf of the Natural Resource Trustees. Comments are presented below corresponding to the specific sections of the document.

General Comments

Generally, the RA Work Plan meets the requirements outlined in the Statement of Work for the Remedial Design and Remedial Action attached as Appendix C to the United States of America v. Georgia-Pacific, LLC, Civil Action No. 1-09-cv-429 dated May 2009.

Please standardize the use of the terms "restoration," "mitigation," "habitat reconstruction," and "wetland restoration" to adhere to a specific definition of each term.

Section 4.3 - Other Natural Resource Trustees

The word "Other" should be removed from the section title as the USEPA is not a trustee.

Section 4.3.2 - State Trustees

The phrase "natural resource divisions" should be removed from the first sentence of this section.

Section 5 - Remedial Action Implementation

This section should discuss pre-site work activities including photographic documentation or video inventory of areas requiring grubbing, tree clearing, or other actions resulting in damage to natural resources and resulting habitat and the relocation of mussels.

Appendix A - Groundwater Monitoring Plan

Section 3 of the Groundwater Monitoring Plan does not appear to include a two-week pre-groundwater monitoring period to verify that the groundwater gradient is outward from the site to the river. This determination is necessary to ensure that groundwater monitoring events are capturing representative site groundwater.

Section 3.2 (Constituents to be Analyzed) specifies that polychlorinated biphenyls (PCBs) will be the only constituent to be analyzed for during the long-term monitoring period. As discussed in the MDEQ's August 17, 2010, Preliminary Design Report comment letter regarding analytes for vertical aquifer sampling and long-term monitoring, the long-term monitoring program needs to include the metals Target Analytical List (TAL), mercury, cyanide, PCBs, dioxins, furans, semi-volatile compound Target Compound List (TCL), and volatile organic compound TCL.

Section 3.3 (Sampling Locations) identifies that new monitoring wells will be installed as prescribed in the Technical Specifications (Section 02522 – Well Installation) and the Multi-Area Field Sampling Plan and that monitoring well construction information will be presented in the addendum to the Groundwater Monitoring Plan. The Standard Operating Procedure F-9 (Monitoring Well Installation and Development Procedures) identifies that pumping, bailing, or surge block purging may be used for well development. As discussed in the MDEQ's comment letter for the Pre-Final Remedial Design (January 13, 2011), the MDEQ recommends that development by mechanical surging be completed to take advantage of the open area provided by wire wrapped screen well construction.

Section 4 (Laboratory Analysis) will need to be revised to include laboratory analysis for metals TAL, mercury, cyanide, dioxins, furans, semi-volatile compound TCL, and volatile organic compound TCL.

The MDEQ recommends that the USEPA provides these comments to the potentially responsible parties for evaluation and incorporation into the final RA Work Plan for the Willow Boulevard/A-Site Landfill. The MDEQ looks forward to assisting the USEPA with

this site in the future. If you have any questions regarding these comments, please contact me at your earliest convenience.

Sincerely,



Kristi Zakrzewski, P.E.

Project Manager

Specialized Sampling Unit

Superfund Section

Remediation Division

517-373-2937

cc: Mr. Jeff Keiser, CH2M Hill
Mr. Scott Hutsell, CH2M Hill
Mr. Patrick McGuire, ARCADIS
Mr. Garry Griffith, Georgia-Pacific LLC
Ms. Daria W. Devantier, MDEQ
Mr. John Bradley, MDEQ
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